

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

IN RE:)	CASE NO: 19-47025-705
HEATHER NICOLLE KING)	Chapter 13
)	
)	Trustee's Objection to Confirmation
)	Original Confirmation Hearing set for :
Debtor)	March 3, 2020 10:00 am

TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN

COMES NOW Diana S. Daugherty, Standing Chapter 13 Trustee, and for her objection to confirmation states as follows:

1. The plan is not proposed in good faith (11 U.S.C. § 1325(a)(3)) because:
Case was filed as a Chapter 7. The Chapter 7 trustee determined that the B22C understated income because it did not include a large amount of tips received as wedding gifts and spent prior to filing on costs associated with Debtor's move to England. The Chapter 7 trustee reported this to the United States Trustee and continued the 341 meeting. Debtor then converted the case, apparently to avoid attending the continued meeting. There is no point to this Chapter 13. Debtor could rebut the 707b presumption of abuse. There are no secured creditors. The Chapter 13 only results in increased attorney fees. This is an attorney fee only case. Case should be reconverted to Chapter 7.
2. Paragraph 3.2 fails to provide repay period for any lease arrearage claim that may be filed.
3. Trustee has not received 2018 federal tax return.

WHEREFORE the Trustee prays the Court enter its order denying confirmation of the proposed plan.

Dated: February 06, 2020

OBJCONF--KLW

/s/ Kathy Wright
Kathy Wright MO31047
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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was filed electronically on February 06, 2020, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to those parties listed on the Court's Manual Notice List and listed below on February 06, 2020.

HEATHER NICOLLE KING
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/s/ Kathy Wright

Kathy Wright MO31047